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December 27, 2023

**By ECF**

The Honorable Cathy L. Waldor, U.S.M.J.  
United States District Court, District of New Jersey  
50 Walnut Street  
Newark, NJ 07101

**Re: *Johnson & Johnson Health Care Systems Inc. v. Save On SP, LLC***  
**Civil Action No. 22-2632 (ES-CLW)**

Dear Judge Waldor:

Together with Patterson Belknap Webb & Tyler LLP, we represent Plaintiff Johnson & Johnson Health Care Systems Inc. ("JJHCS") in the above-referenced action. We write to advise the Court of two issues that remain subsequent to the motion to seal of defendant Save On SP, LLC ("SaveOnSP"), dated June 16, 2023 (ECF No. 117), which sought to seal the joint letter, dated June 2, 2023, regarding JJHCS's request to de-designate the patient list (ECF No. 109), and the Court's Order, dated August 18, 2023 (ECF No. 145). Counsel for SaveOnSP consents to the relief requested below.

First, JJHCS seeks leave to publicly file an unredacted version of the June 2, 2023 joint letter (ECF No. 109) without Exhibit A. As detailed in SaveOnSP's letter to Your Honor, dated September 8, 2023 (ECF No. 154), SaveOnSP declined to make a supplemental filing in support of that portion of the motion to seal seeking to seal the letter itself, and therefore the letter itself may be unsealed. On September 8, 2023, SaveOnSP refiled both a public and sealed version of Exhibit A to the June 2, 2023 letter (ECF Nos. 152 and 153), but the unredacted version of the June 2, 2023 letter remains under seal.

Second, JJHCS respectfully requests that the Court lift the temporary seal on my letter dated June 19, 2023 (ECF No. 119), which sets forth JJHCS's opposition to seal the June 2, 2023 letter (while agreeing to seal the patient list set forth in Exhibit A). As the Court may recall, the Court placed a temporary hold on my June 2, 2023 letter at SaveOnSP's request (ECF No. 120). As SaveOnSP did not subsequently seek to seal ECF No. 119, both parties agree that it can be placed on the public docket.

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Accordingly, we respectfully request that the Court so order the attached letter thereby (i) granting leave to JJHCS to publicly file an unredacted version of the joint letter, dated June 2, 2023 (ECF No. 109) (while maintaining the patient list at Exhibit A under seal), and (ii) directing the Clerk to unseal JJHCS's letter, dated June 19, 2023 (ECF No. 119).

We thank the Court for its attention to this matter.

Respectfully yours,

*/s/ Jeffrey J. Greenbaum*

JEFFREY J. GREENBAUM

cc: All counsel of record (by ECF)

Per the parties' agreement, discussed herein, and for good cause shown, it is on this 29th day of December, 2023,

**ORDERED** that the Clerk of the Court shall unseal Docket Entry No. 109. The Clerk of the Court shall, however, continue to maintain the attachment to that letter, (ECF No. 109-1), under seal pursuant to this Court's August 18, 2023 Order. (ECF No. 145); and it is further

**ORDERED** that the Clerk of the Court shall unseal Plaintiff's June 19, 2023 letter, (ECF No. 119).

**s/ Cathy L. Waldor**

Hon. Cathy L. Waldor, U.S.M.J.